

EXHIBIT A

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)		
		APRIL 2019 E-Filing Number: 1904025695		
PLAINTIFF'S NAME KATHLEEN HOKE-WHITE		DEFENDANT'S NAME FIRST TRANSIT, INC.		
PLAINTIFF'S ADDRESS 520 COLLINGS AVE., APT. B-903 COLLINGSWOOD NJ 08107		DEFENDANT'S ADDRESS 2221 E. LAMAR BLVD., SUITE 500 ARLINGTON TX 76006-7447		
PLAINTIFF'S NAME		DEFENDANT'S NAME FIRSTGROUP AMERICA, INC.		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 2221 E. LAMAR BLVD., SUITE 500 ARLINGTON TX 76006-7447		
PLAINTIFF'S NAME		DEFENDANT'S NAME		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS		
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions		
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other:	<input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition	<input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER				
STATUTORY BASIS FOR CAUSE OF ACTION				
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) FILED PRO PROTHY APR 10 2019 M. BRYANT			IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>KATHLEEN HOKE-WHITE</u> Papers may be served at the address set forth below.				
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY BRAD S. RUSH		ADDRESS 123 SOUTH BROAD STREET SUITE 2250 PHILADELPHIA PA 19109		
PHONE NUMBER (215) 735-5476	FAX NUMBER (215) 735-9057			
SUPREME COURT IDENTIFICATION NO. 72896		E-MAIL ADDRESS brad@kovlerrush.com		
SIGNATURE OF FILING ATTORNEY OR PARTY BRAD RUSH		DATE SUBMITTED Wednesday, April 10, 2019, 12:50 pm		

THIS IS A NON-JURY MATTER and Attested by the
ASSESSMENT OF DAMAGES IS PREVIOUSLY MADE RECORDS

10 APR 2019 11:50 pm



KOHLER & RUSH, P.C.
BY: BRAD S. RUSH, ESQUIRE
Atty. ID NO.: 72896
123 South Broad Street, Suite 2250
Philadelphia, Pennsylvania 19109
(215)735-5476

Attorney for Plaintiff

KATHLEEN HOKE-WHITE
520 Collings Avenue, Apt. B-903
Collingswood, NJ 08107

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY

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THIS IS A NON-JURY MATTER
ASSESSMENT OF DAMAGES IS REQUIRED

KOVLER & RUSH, P.C.
BY: BRAD S. RUSH, ESQUIRE
Atty. ID NO.: 72896
123 South Broad Street, Suite 2250
Philadelphia, Pennsylvania 19109
(215)735-5476

Attorney for Plaintiff

KATHLEEN HOKE-WHITE
520 Collings Avenue, Apt. B-903
Collingswood, NJ 08107

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY

vs.

FIRST TRANSIT, INC
2221 E. Lamar Blvd., Suite 500
Arlington, TX 76006-7447
And
FIRSTGROUP AMERICA, INC.
2221 E. Lamar Blvd., Suite 500
Arlington, TX 76006-7447

: NO.:
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C O M P L A I N T

C I V I L A C T I O N

1. Plaintiff is an individual residing at the address above address.
2. Defendant, First Transit, Inc., is a corporation or other business entity with offices located at the address above address.
3. Defendant, Firstgroup America, Inc., is a corporation or other business entity with offices located at the address above address.

C O U N T I

KATHLEEN HOKE-WHITE VS. FIRST TRANSIT, INC.
AND FIRSTGROUP AMERICA, INC.
(LIABILITY)

4. Plaintiff realleges each and every allegation contained in paragraphs 1 through 3 as if more fully set forth herein.

5. On or about July 17, 2017, at approximately 2:00 p.m., Plaintiff, Kathleen Hoke-White was a lawful passenger and fare-paying customer on defendants' vehicle, which was being operated at the Philadelphia International Airport, Philadelphia, Pennsylvania, specifically at the economy parking lot, when defendants' vehicle door or doors were operated in such a careless, reckless and negligent manner, so as to cause them to close and strike plaintiff, and as a result thereof, plaintiff suffered injuries and damages as hereinafter more fully set forth.

6. All of the acts done or not done by the defendants were done or not done by its agent, servant, workman and/or employee, acting in the course and scope of his/her employment, for and on behalf of the defendants.

7. The accident was caused solely as a result of the carelessness, recklessness and negligence of the defendants, by and through its agent, servant, workman and/or employee, who was acting within the course and scope of his/her agency or employment and was due in no manner whatsoever to any act or failure to act on the part of the plaintiff.

8. The carelessness, recklessness and negligence of the defendants, herein consisted of:

- a. Failing to operate said vehicle and vehicle door or doors with due regard to the rights, position and safety of the plaintiff;
- b. Failing to maintain said vehicle and vehicle door or doors under the proper and adequate control under the circumstances;
- c. Failing to keep a proper lookout;

- d. Carelessly, recklessly and negligently operating said bus door or doors;
- e. Violations of the Statutes of the Commonwealth of Pennsylvania and Local Ordinances; and
- f. Otherwise failing to use due and proper care under the circumstances.

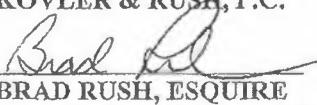
9. As a result of the aforesaid, Plaintiff, Kathleen Hoke-White, sustained severe personal injuries, including but not limited to cervical, thoracic and lumbar strain and sprain, cervical and lumbar radiculopathies, post traumatic cephalgia, cervical and lumbar facet syndrome, cervical disc herniations, lumbar disc bulges, all of which may be permanent in nature and all of which caused and will continue to cause plaintiff to suffer great pain and mental anguish, to her damage and loss.

10. As a further result of the aforesaid, plaintiff has and may in the future be obliged to spend large and various sums of money in endeavoring to treat and cure plaintiff of her aforesaid injuries, to her damage and loss.

11. As a result of the aforesaid, plaintiff has and may in the future be hindered and prevented from attending to her usual and daily duties and occupations, and has and may in the future experience grievous pain and mental anguish, to her damage and loss.

WHEREFORE, Plaintiff, Kathleen Hoke-White, demands judgment against the Defendants, First Transit, Inc. and Firstgroup America, Inc., jointly and severally, in an amount of money in excess of Fifty Thousand (\$50,000.00) Dollars.

Dated: 4/10/19

KOVLER & RUSH, P.C.
BY: 
BRAD RUSH, ESQUIRE
ATTORNEY FOR PLAINTIFF

VERIFICATION

The undersigned, being duly sworn according to law, deposes and says that he is counsel for the party or parties indicated on the preceding pages as being represented by said counsel, that he has examined the pleading and the entire investigative file made on behalf of said party or parties, that he is taking this verification to assure compliance with the pertinent rules pertaining to timely filing of pleading and other documents described by said rules; and the facts set forth in the foregoing documents are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4940 relating to unsworn falsification to authorities.

KOVLER & RUSH, P.C.

Date: 4/10/19

BY:

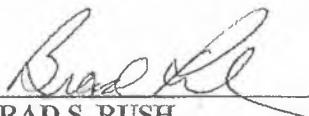

BRAD S. RUSH
Attorney for Plaintiff

EXHIBIT B

KOVLER & RUSH, P.C.
BY: BRAD S. RUSH, ESQUIRE
Atty. ID NO.: 72896
123 South Broad Street, Suite 2250
Philadelphia, Pennsylvania 19109
(215)735-5476

Attorney for Plaintiff

Filed and Attested by the
Office of Judicial Records
16 APR 2019 12:11 pm

KATHLEEN HOKE-WHITE

vs.

FIRST TRANSIT, INC. and
FIRSTGROUP AMERICA, INC.

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:
:
: NO.: 190401580
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**AFFIDAVIT OF SERVICE ON
DEFENDANT, FIRST TRANSIT, INC.**

1. I, the undersigned, Brad S. Rush, Esquire, am the attorney for the Plaintiff in the above-captioned matter.

2. I mailed a true and correct copy of the Civil Action Complaint in this matter to Defendant, First Transit, Inc., at their last known address via regular U.S. mail as well as via certified, return receipt requested bearing article number 7014 3490 0000 7868 7747.

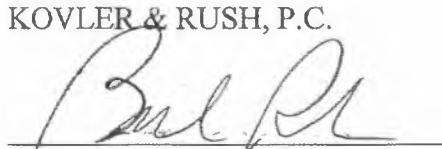
3. I am attaching a printout from USPS Tracking indicating that the Civil Action Complaint was delivered on **April 15, 2019**. The aforesaid USPS Tracking printout is attached hereto.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

KOVLER & RUSH, P.C.

DATE: 4-16-19

BY:


BRAD S. RUSH

Attorney for Plaintiff

Sworn and Subscribed
before me this 16th day
of April, 2019.


Notary Public

Commonwealth of Pennsylvania - Notary Seal
MELANY KREFT, Notary Public
Philadelphia County
My Commission Expires December 6, 2021
Commission Number 1285291

[FAQs > \(https://www.usps.com/faqs/uspstracking-faqs.htm\)](https://www.usps.com/faqs/uspstracking-faqs.htm)[Track Another Package +](#)**Tracking Number:** 70143490000078687747[Remove X](#)

Your item was delivered to the front desk, reception area, or mail room at 2:38 pm on April 15, 2019 in ARLINGTON, TX 76006.

Delivered

April 15, 2019 at 2:38 pm
Delivered, Front Desk/Reception/Mail Room
ARLINGTON, TX 76006

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[Tracking History](#) ^

April 15, 2019, 2:38 pm
Delivered, Front Desk/Reception/Mail Room
ARLINGTON, TX 76006

Your item was delivered to the front desk, reception area, or mail room at 2:38 pm on April 15, 2019 in ARLINGTON, TX 76006.

April 15, 2019
In Transit to Next Facility

April 12, 2019, 10:59 pm
Departed USPS Regional Facility
FORT WORTH TX DISTRIBUTION CENTER

Case ID: 190401580

April 12, 2019, 9:13 am
Arrived at USPS Regional Facility
FORT WORTH TX DISTRIBUTION CENTER

April 10, 2019, 10:33 pm
Arrived at USPS Regional Facility
PHILADELPHIA PA DISTRIBUTION CENTER

Product Information

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Go to our FAQs section to find answers to your tracking questions.

[FAQs \(https://www.usps.com/faqs/uspsttracking-faqs.htm\)](https://www.usps.com/faqs/uspsttracking-faqs.htm)

Feedback

The easiest tracking number is the one you don't have to know.

Case ID: 19040158C

EXHIBIT C

KOVLER & RUSH, P.C.
BY: BRAD S. RUSH, ESQUIRE
Atty. ID NO.: 72896
123 South Broad Street, Suite 2250
Philadelphia, Pennsylvania 19109
(215)735-5476

Attorney for Plaintiff

Filed and Attested by the
Office of Judicial Records
16 APR 2019 12:11 pm

KATHLEEN HOKE-WHITE

vs.

FIRST TRANSIT, INC. and
FIRSTGROUP AMERICA, INC.

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
:
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: NO.: 190401580
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**AFFIDAVIT OF SERVICE ON
DEFENDANT, FIRSTGROUP AMERICA, INC.**

1. I, the undersigned, Brad S. Rush, Esquire, am the attorney for the Plaintiff in the above-captioned matter.

2. I mailed a true and correct copy of the Civil Action Complaint in this matter to Defendant, Firstgroup America, Inc., at their last known address via regular U.S. mail as well as via certified, return receipt requested bearing article number 7014 3490 0000 7868 7730.

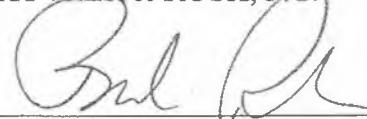
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DATE: 4/16/19

BY:

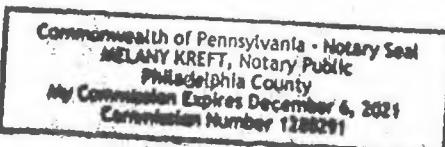
KOVLER & RUSH, P.C.



BRAD S. RUSH
Attorney for Plaintiff

Sworn and Subscribed
before me this 16th day
of April, 2019.

Melany Kreft
Notary Public



[FAQs > \(https://www.usps.com/faqs/uspstracking-faqs.htm\)](https://www.usps.com/faqs/uspstracking-faqs.htm)[Track Another Package +](#)**Tracking Number:** 70143490000078687730[Remove X](#)

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Delivered

April 15, 2019 at 2:38 pm
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[Text & Email Updates](#) ▾

[Tracking History](#) ^

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In Transit to Next Facility

April 12, 2019, 10:58 pm
Departed USPS Regional Facility
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Case ID: 190401580

April 12, 2019, 9:13 am

Arrived at USPS Regional Facility

FORT WORTH TX DISTRIBUTION CENTER

April 10, 2019, 10:33 pm

Arrived at USPS Regional Facility

PHILADELPHIA PA DISTRIBUTION CENTER

Product Information



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